

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT COURT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	
v.)	CASE NO. 1:19-cr-10080-NMG
)	
David Sidoo, et.al. and John Wilson (No. 17))	
)	
Defendant.)	

**MOTION FOR ADMISSION
PRO HAC VICE OF DONALD H HELLER, ESQUIRE
AND LOCAL RULE 7.1(a)(2) CERTIFICATE**

Pursuant to District of Massachusetts Local Rule 83.5.3(e)(2) undersigned counsel hereby moves that Donald H. Heller, Esquire of Donald H. Heller, a Law Corporation, 3638 American River Dr.'s Sacramento, CA 95864, be admitted to appear on behalf of defendant William Rick Singer and Williams & Olds, CPAs and to practice before this court in the above entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Mr. Heller is and has been a member in good standing of the Bar of the State of New York since December 17, 1969 [NY Office of Court Administration, Attorney Registration Unit, Registration #: 2494698];
2. Mr. Heller is and has been a member in good standing of the bar of the state of California since June 27, 1973[California State Bar #55717];
3. Mr. Heller is and has been a member in good standing of the bars of the Following United States District Courts and Court of Appeals for more than 40 years:

United States District Court for the Eastern District of California;

United States District Court for the Northern District of California;

United States District Court for the Southern District of California;

United States court of appeals for the Ninth Circuit; and for more than 10 years in the

United States District Court for the Southern District of New York.

4. There are no disciplinary proceedings pending against Mr. Heller as a member of the bar in any jurisdiction;

5. Mr. Heller has represented to the undersigned counsel that he has read and is familiar with the local rules of the United States District Court for the District of Massachusetts.

6. Attached as Exhibit A hereto, Is Mr. Heller's Certification by Attorney under District Court of Massachusetts Local Rule 83.5.3(e)(3).

7. Mr. Heller has been admitted Pro Hoc Vice in a case related to the above case, United States v. William Rick Singer, CASE NO. 19cr10078-1-RWZ. That case is still pending awaiting the scheduling of a sentencing date.

8. The undersigned requests that the Court grant this motion so that Mr. Heller can file pleadings and appear and be heard at all proceedings in this case on behalf of William Rick Singer; and Williams & Olds, CPAs.

9. Payment in the amount of \$100.00 will be made upon allowance of this motion. WHEREFORE, the undersigned counsel respectfully moves Mr. Heller's admission To Practice before This Court *pro hac vice*.

LOCAL RULE 7.1(a)(2) CERTIFICATE

Pursuant to Local Rule 7.1(a)(2), the undersigned certifies that counsel has conferred with the United States Attorney's Office who has stated it assents to this motion and that counsel for Mr. Wilson has stated that they will not oppose this motion.

Respectfully submitted,

/s/ A. Neil Hartzell
A. Neil Hartzell, MA No. 544752
FREEMAN MATHIS AND GARY, LLP,
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Dated: June 5, 2020

Certificate Of Service

I hereby certify that the foregoing Motion For Admission Pro Hac Vice Of Donald H Heller, Esquire and Local Rule 7.1(A)(2) Certificate were filed through the Electronic Case Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

s/ A. Neil Hartzell

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**MOTION FOR ADMISSION
PRO HAC VICE OF DONALD H HELLER, ESQUIRE**

Pursuant to Rule 83.5.3(e)(3) of the Local Rules of the United States District Court for the District of Massachusetts, I, Donald H. Heller, Esquire, hereby certify that: (1) I am admitted to the bars of the Courts described in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) I have never been subject to any disciplinary proceedings and accordingly, no disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I have read and I am familiar with the local rules of the United States District Court for the District of Massachusetts.

I declare the foregoing to be true and correct under the penalty of perjury under the laws of the United States of America. Executed this 3rd day of June 2020, in Sacramento, State and Eastern district of California

/s/ Donald H. Heller
Donald H. Heller